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Hearing Date and Time: July 19, 2007 at 10:00 a.m.  
Response Date and Time: July 12, 2007 at 4:00 p.m.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re

DELPHI CORPORATION, *et al.*,

Debtors.

Chapter 11

Case No. 05-44481 (RDD)

Jointly Administered

RESPONSE OF MOTION INDUSTRIES, INC. TO DEBTORS' SEVENTEENTH OMNIBUS OBJECTION (SUBSTANTIVE) PURSUANT TO 11.U.S.C. § 502(B) AND FED. R. BANKR. P. 3007 TO CERTAIN (A) INSUFFICIENTLY DOCUMENTED CLAIMS, (B) CLAIMS NOT REFLECTED ON DEBTORS' BOOKS AND RECORDS, (C) INSURANCE CLAIM NOT REFLECTED ON DEBTORS' BOOKS AND RECORDS, (D) UNTIMELY CLAIMS AND UNTIMELY TAX CLAIMS, AND (E) CLAIMS SUBJECT TO MODIFICATION, TAX CLAIMS SUBJECT TO MODIFICATION, AND MODIFIED CLAIMS ASSERTING RECLAMATION (the "SEVENTEENTH OMNIBUS CLAIMS OBJECTION")

Motion Industries, Inc. ("Motion"), by and through its undersigned attorneys, for its Response to Debtors' Seventeenth Omnibus Claims Objection (the "Response") respectfully states as follows:

1. On October 8 and 14, 2005 (the "Petition Date(s)"), Delphi Corporation and certain of its subsidiaries and affiliates (the "Debtors") filed voluntary petitions for relief under Chapter 11 of the title 11 of the United States Code (the "Bankruptcy Code"). The Debtors continue to operate their businesses and manage their properties as debtors-in-possession under Sections 1107(a) and 1108 of the Bankruptcy Code. The Court has ordered joint

administration of these cases.

2. On April 12, 2006, this Court entered an order establishing July 31, 2006 (the “Bar Date”) as the last date for entities to file proofs of claim against the Debtor(s).

3. On July 21, 2006, Motion filed proof of claim No. 10231 in the amount of \$6,132.75 in the Delphi Connection Systems case (the “DCS Claim”). On July 21, 2006, Motion also filed proof of claim No. 10232 in the amount of \$108,287.35 in the Delphi Medical Systems Colorado Corporation case (the “DMSCC Claim”).

4. On June 15, 2007, the Debtors filed the Seventeenth Omnibus Claims Objection, wherein they objected to the DCS Claim and the DMSCC Claim (collectively, the “Claims”) as claims subject to modification. The Debtors and Motion have tentatively settled their differences related to the Claims which they have memorialized in a draft Settlement Agreement and Joint Stipulation and Agreed Order Compromising and Allowing the Claims and other claims filed by Motion which are addressed in the Sixteenth Omnibus Claims Objection (the “Joint Stipulation”). The parties contemplate that once the Joint Stipulation is entered by the Bankruptcy Court, Motion will withdraw this Response. Until that time however, Motion wants to protect its interests in connection with the Seventeenth Omnibus Claims Objection.

**CONCLUSION**

5. For the reasons set forth above, Motion respectfully requests that the Court adjourn the hearing on the Claims until the parties are able to consummate the settlement referenced above. Motion further request such other and further relief as the Court deems equitable.

Respectfully Submitted,

Dated: July 11, 2007

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